## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JOANNA WILSON, as Independent Administrator of the Estate of AREON J. MARION, Deceased,	
of the Estate of AREON J. MARION, Deceased,	)
Plaintiff,	)
v.	) Case No.: 22-cv-06886
COOK COUNTY, ILLINOIS, a unit of local government and d/b/a COOK COUNTY HEALTH AND HOSPITALS SYSTEM and CERMAK HEALTH SERVICES OF COOK COUNTY, YASER HAQ, M.D., STEVE PASCHOS, M.D., MICHAEL BEDNARZ, M.D., AHLEAH C. BALAWENDER PA-C, JASON SPRAGUE, LAUREN CARTWRIGHT, NIKKI RUFFIN, COOK COUNTY SHERIFF, AND	Hon. Andrea R. Wood  ) ) ) ) )
OFFICER B. VARGAS 16976,	)
Defendants.	)

# **JOINT STATUS REPORT**

Plaintiff, Joanna Wilson, and Defendants, COOK COUNTY, ILLINOIS, COOK COUNTY SHERIFF'S OFFICE, Yaser Haq, Ahleah C. Balawender PA-C, Jason Sprague, Lauren Cartwright, Nikki Ruffin, and Officer B. Vargas, by their respective attorneys, hereby submit the following joint status report:

#### 1. Discovery

The parties are in the process of completing written discovery. To date, Plaintiff has responded to discovery requests issued by Defendants. Defendant Paschos, Defendant Ruffin, and the Cook County Sheriff answered written discovery. The remaining Cook County Defendants are in the process of answering written discovery. Thereafter, the parties will need some time to review the voluminous documents and may thereafter initiate oral discovery, should the Court deny the parties' request for a brief stay on oral discovery.

#### 2. Settlement

A. Plaintiff made a demand to settle this matter.

- B. Plaintiff and counsel for Cook County (indemnitor) have had fruitful discussions regarding settlement and hereby request a referral to the magistrate for a settlement conference.
- C. For purposes of judicial economy, and given the number of parties involved in this case, the parties are requesting a brief stay on oral discovery while the parties explore settlement.
- D. The parties propose to provide the Court with a status report by August 15, 2023 advising the date of the settlement conference and proposing a subsequent date thereafter in which the parties will advise the Court of settlement and any future discovery schedule.

Dated: July 10, 2023.

Respectfully submitted,

/s/ James C. Pullos

James C. Pullos CLIFFORD LAW OFFICES, P.C. 120 N. LaSalle St., Suite 3600 Chicago, IL 60602 (312) 899-9090 jcp@cliffordlaw.com Attorney for Plaintiff

#### /s/ Mia Buntic

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### /s/ Antonio Lee

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# **CERTIFICATE OF SERVICE**

I, James C. Pullos, an attorney, hereby certify that on July 10, 2023 I served **JOINT STATUS REPORT** by causing a true and accurate copy of such papers to be filed and served on all counsel of record via the Court's CM/ECF electronic filing system.

/s/ James C. Pullos
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